

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NO: 05-CR-10220-NMG

UNITED STATES OF AMERICA)
)
vs.)
)
JAMES GOODWYN)
)
_____)

MOTION TO CONTINUE THE RULE 11 PLEA HEARING

The defendant, James Goodwyn, through counsel, moves this court, pursuant to Federal Rule of Criminal Procedure 32(e)(2) to continue the Rule 11 hearing to any date after October 1, 2006. As reasons therefore, counsel for the defendant asserts the following:

1. The plea and sentencing hearing is currently scheduled for August 17, 2006.
2. Counsel for the defendant received the Presentence Report on August 1, 2006.

The report was not issued 35 days before sentencing.

3. The defendant does not waive the minimum period.
4. The above requested continuance is necessary for the adequate preparation of the case.

By his attorney,

/s/ Joseph F. Krowski Jr.
JOSEPH F. KROWSKI JR.
30 Cottage Street
Brockton, MA. 02301
508-584-2555

Dated: August 1, 2006

